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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER
IN SUPPORT OF PLAINTIFF WAYMO
LLC'S ADMINISTRATIVE MOTION TO
FILE UNDER SEAL PORTIONS OF ITS
JUNE 15, 2017 LETTER BRIEF
REGARDING PRIVILEGE ISSUES**

1 I, Lindsay Cooper, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under
7 Seal Portions of its June 15, 2017 Letter Brief Regarding Privilege Issues (the “Administrative
8 Motion”). The Administrative Motion seeks an order sealing the following materials:

9 Document	Portions to Be Filed Under Seal	Designating Party
10 Portions of Waymo’s Letter Brief	Portions highlighted in blue	Defendants
11 Exhibits 1-3 and 13 to the Declaration of Kevin Smith	Entire Documents	Defendants

12
13 3. Waymo has filed portions of its Letter Brief under seal because it contains information
14 that Defendants have designated confidential. And while Defendants have stated that they do not
15 consider their privilege logs confidential, they nevertheless do not want their clients’ email addresses
16 made public. Accordingly, Waymo has filed Exhibits 1-3 and 13 to the Declaration of Kevin Smith
17 completely under seal so Defendants can determine which email addresses, if any, merited sealing.

18 4. Waymo expects Defendants to file one or more declarations in accordance with the
19 Local Rules.
20

21 I declare under penalty of perjury under the laws of the State of California and the United
22 States of America that the foregoing is true and correct, and that this declaration was executed in San
23 Francisco, California, on June 16, 2017.
24

25 By /s/ Lindsay Cooper
26 Lindsay Cooper
27 Attorney for WAYMO LLC
28

SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Lindsay Cooper.

/s/ Charles K. Verhoeven
Charles K. Verhoeven